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Admitted In: NJ, NY

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March 13, 2019

**Via ECF**

Honorable Michael A. Hammer  
United States Magistrate Judge  
United States District Court for the District of New Jersey  
50 Walnut Street 2C  
Newark, New Jersey 07101

**Re: Hager v. Nat'l Recovery Agency**  
**Case No.: 2:17-cv-07450-MCA-MAH**

Dear Judge Hammer:

This firm represents defendant National Recovery Agency (“NRA”) in the above-referenced matter. We respectfully write to Your Honor to request an adjournment of tomorrow’s hearing, or alternatively, request that NRA’s representative be permitted to appear via telephone. [Dkt. 33]. First, NRA’s chief representative and CEO, Steve Kusic is scheduled to appear in Federal Court tomorrow in the United States District Court for the District Of Utah, Central Division in the matter, *Advanced Recovery Systems, LLC vs. American Agencies, LLC* (Case No. 2:13-cv-00283-DAK) before Judge Dale A. Kimball.

Mr. Kusic is expected to testify in that matter tomorrow morning and therefore will have limited to no availability at the time of tomorrow’s hearing. Mr. Kusic has been my main contact in this matter and is the only NRA representative with knowledge of this case. Due to his familiarity with this case, Mr. Kusic prefers to be involved in any and all settlement discussions in this matter. Based on Mr. Kusic’s unavailability, we respectfully request an adjournment of tomorrow’s hearing.

If Your Honor is not inclined to grant an adjournment of tomorrow’s hearing, NRA alternatively requests that NRA’s representative – who will have very limited knowledge of the procedural history and will need to contact Mr. Kusic to obtain settlement authority – be permitted to appear via telephone at tomorrow’s conference. NRA does not have a New Jersey office. Rather, its lone office is located in Harrisburg, PA – more than 160 miles away from Newark, New Jersey. As such, NRA’s representative, who has limited will be forced to travel 320 miles to appear for tomorrow’s in-person hearing. Accordingly, NRA respectfully requests that its representative be permitted to appear via telephone.

We thank Your Honor for his consideration.

Honorable Michael A. Hammer, Magistrate Judge

March 11, 2019

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Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

*/s/ Matthew P. Gallo*

MATTHEW P. GALLO

cc: All Counsel of Record (via ECF)